



STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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March 27, 1998

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554


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Re: CC Docket No. <sup>95-116</sup>~~95-538~~, Telephone Number Portability Petition for Waiver

Attached please find the comments of the Connecticut Department of Public Utility Control (CTDPUC) concerning the Federal Communications Commission's March 20, 1998 request for comments concerning an extension of time to May 15, 1998, for the deployment of the Local Number Portability Phase II deadline.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

  
Robert J. Murphy  
Executive Secretary

attachment

cc: Jeannie Grimes  
FCC Common Carrier Bureau  
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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

In the Matter of )

Telephone Number Portability )

95-116  
CC Docket No. 98-538

PETITION FOR WAIVER

COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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## **I. INTRODUCTION**

In response to the Federal Communications Commission's (Commission) March 20, 1998 request for comments concerning an extension of time to May 15, 1998, for the deployment of the Local Number Portability (LNP) Phase II deadline, the Connecticut Department of Public Utility Control (CTDPUC) provides the following comments for the Commission's consideration. From the outset, CTDPUC notes that while the Commission has requested comments concerning the delay of the Phase II implementation, it is unclear as to whether the Commission is seeking comments concerning a delay for only those areas initially served by the Perot Systems Corporation in the Southeast, Western and West Coast LLC regions, those areas that were initially contracted with Lockheed Martin-IMS, or all regions, most notably, Connecticut. In light of the uncertainty of the applicability of the Phase II delay, CTDPUC submits the following.

## **II. DISCUSSION**

CTDPUC strongly opposes any postponement in the Phase II implementation of LNP because if approved, it could delay bringing the full benefits of local competition to all telephone subscribers in a timely manner. Since July 1994, CTDPUC has been investigating and promoting the development of a competitive telecommunications marketplace in Connecticut. Throughout several proceedings testimony presented by a number of parties indicated that the linchpin for true local exchange competition was the ability of customers to freely take or "port" their telephone number as they moved from

one carrier to another.<sup>1</sup> It is expected that as of the fourth quarter 1998, approximately 50% of Connecticut residents will lack the ability to port their telephone numbers using permanent number porting technology.<sup>2</sup> If these subscribers choose to switch carriers (and retain their telephone numbers), they will be required to port their telephone numbers using an inferior form of number porting, most likely, Remote Call Forwarding (RCF) or Direct Inward Dialing. The use of RCF is inferior to permanent LNP because certain CLASS functions and features such as Caller ID and other vertical features requiring Signaling System 7 (SS7) services will not be available to those subscribers. Additionally, the use of RCF based interim number portability techniques requires that an additional telephone number be used for each number ported, thereby contributing to telephone number exhaust.

CTDPUC also opposes a delay in the implementation of Phase II LNP deployment because beginning on January 4, 1999, local exchange subscriber balloting is scheduled to begin in Connecticut.<sup>3</sup> If Phase II LNP implementation is delayed, approximately 50% of Connecticut residents and businesses located in those areas served by the RCF based number porting technology will be

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<sup>1</sup> See for example, Docket No. 94-10-02, DPUC Investigation into the Unbundling of the Southern New England Telephone Company's Local Telecommunications Network and Docket No. 95-11-08, Application of the Southern New England Telephone Company for Approval to Offer Interconnection Services and Other Related Items Associated with the Company's Local Exchange Access Tariff.

<sup>2</sup> The Southern New England Telephone Company (SNET) is expected to deploy the technology for permanent local number portability. SNET will begin implementation of LNP in the Hartford Metropolitan Statistical Area (MSA) by April 1, 1998 and the New Haven MSA by October 1, 1998. SNET estimates that once LNP has been deployed in the Hartford and New Haven MSAs, approximately 50% of the state will be served by LNP.

<sup>3</sup> June 25, 1997 and December 22, 1997 Decisions in Docket No. 94-10-05, DPUC Investigation of the Southern New England Telephone Company for Affiliate Matters Associated with the Implementation of Public Act 94-83.

subject to a lower level of service which could bias end user balloting toward SNET's affiliated competitive local exchange carrier, SNET America, Inc. should these subscribers desire to retain their present telephone numbers. That is, affected subscribers would be less inclined to change local service providers (and would remain with SNET) rather than having to decide between receiving a new telephone number or being unable to subscribe to SS7-based vertical services and features. Therefore, in order for the Connecticut local election balloting process to be conducted in a competitively neutral and unbiased manner, permanent LNP must be fully deployed on time and without delay.

### **III. CONCLUSION**

CTDPUC objects to any delay in the Phase II deployment of the LNP technology. A delay in the implementation of the Phase II LNP technology will postpone bringing the full benefits of local competition to end users while

providing an inequitable level of telephone services to subscribers changing carriers who retain their telephone numbers. Therefore, those petitions seeking to delay the deployment of Phase II number porting technology should be denied.

Respectfully submitted,

Donald W. Downes  
Chairman

Glen Arthur  
Vice-Chairman

Jack R. Goldberg  
Commissioner

John W. Betkoski, III  
Commissioner

Linda Kelly Arnold  
Commissioner

March 30, 1998

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